



Downes Crediton Golf Club

DOWNES CREDITON GOLF CLUB

PRIVACY AND GDPR POLICY

<u>Version Number</u>	<u>Change Detail</u>	<u>Date of Change</u>	<u>Authorised</u>
<u>1.0</u>	<u>Draft</u>	<u>22/01/21</u>	<u>28/01/21</u>

Signed..... Club Manager

Signed..... Board Representative



Downes Crediton Golf Club

Our Privacy Statement

At Downes Crediton Golf Club, we value the trust placed in us by customers, suppliers and colleagues who give us their personal data. Data security is one of our highest priorities and we aim to be as clear as possible about what we do with personal data and why we do it.

Your privacy is really important to us, and we understand how important it is to you. Our aim is to be as clear and open as possible about what we do and why we do it. Downes Crediton Golf Club is committed to the privacy of all its users and customers.

Who we are

“We” or “Us” Downes Crediton Golf Club, whose address is Downes Crediton Golf Club, Hookway, Crediton, Devon, EX17 3PT.

Who this policy applies to

This policy applies to both members, visitors at the club and website visitors. These terms have the following meanings;

Visitors at the club: Non-members either playing golf or using the clubhouse and its facility.

Website visitors: anyone visiting our website.

Members: anyone that receives our services, provided directly by us, and has the ability to log in to the Member`s area.

Information we collect

We collect information about you when you voluntary provide feedback, participate in competitions and also when completing our online contact form. As part of any of these forms, you may need to give your contact information. We use the information given to us by you to provide the service you request from us in the way that is set out in this privacy policy.

IP addresses – when you visit our site, we will automatically receive your IP address, a unique identifier for your computer or other access device.

Website improvement – to help us design our website and improve your experience, we may collect information about the way you use and access our website. Our web system collects information about each visitor, including IP address, the length of time spent on the website and the order in which pages are visited. We may employ third party experts to help us look at this information. However, we make sure that anyone we employ treats all information with the same sensitivity and security that we treat it. This is explained in more detail in the cookies section below.

How we use your information

We may use your Information to (but not limited too):

Create and manage your account, when you purchase from us;

Provide quotes for our products and services;

Process your purchase transactions;

Manage your subscriptions;

Members - Subscribe you to a newsletter, send product updates or technical alerts if you have opted in;



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Communicate with you about and manage your participation in golf club activities.
Secure our systems and applications;
Enforce our legal rights or comply with legal requirements.

Visitors to our website

When someone visits our website, we use a third-party service, Google Analytics, to collect standard internet log information and details of visitor behaviour patterns. We do this to find out things such as the number of visitors to the various parts of the site. This information is only processed in a way which does not identify anyone. We do not make, and do not allow Google to make, any attempt to find out the identities of those visiting our website. If we do want to collect personally identifiable information through our website, we will be up front about this. We will make it clear when we collect personal information and will explain what we intend to do with it.

Intelligent Golf

We use a third-party service, intelligentgolf, to publish our website. This site is hosted by Amazon Servers in Ireland. We use a standard service to collect anonymous information about users' activity on the site, for example the number of users viewing pages on the site, to monitor and report on the effectiveness of the site and help us improve it.

Social Media

We do not use a third-party provider.

Cookies

Our sites use a number of different cookies. Below we explain the cookies we use and why we use them.

What is a cookie?

A cookie is a small text file that may be placed on your device when you visit our sites. When you next visit our sites, the cookie allows us to distinguish you from other users.

There are two broad categories of cookies:

Persistent cookies

Persistent cookies remain on your device until deleted manually or automatically.

Session cookies

Session cookies remain on your device until you close your browser when they are automatically deleted.

Cookies we use and why we use them

Essential cookies

Essential cookies are technical cookies that are required for the operation of our site. Without essential cookies our site can't operate properly. Essential cookies include, for example, cookies that enable you to log into secure areas.

Performance cookies

Performance cookies allow us to recognise and count the number of visitors to our site and to see how visitors move around them. This helps us to improve the way our site work by enabling



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us to tailor our site to the way visitors use them. The information we collect from performance cookies is aggregated which means that we cannot identify you from it.

Experience cookies

Experience cookies allow our site to remember the choices you make. Our site uses experience cookies to provide you with enhanced and personalised features. For example, we use information collected through what are known as “web-analytic” cookies to compare the choices you make to those of our other customers so that we can learn from those choices.

Information collected by experience cookies cannot track your browsing activity when you leave our sites to browse other sites.

Your right to refuse cookies and what happens if you refuse them

You can refuse cookies by activating the relevant setting on your browser. However, if you do so you may not be able to access all or parts of our sites. If you carry on using our sites and do not change your browser settings, we will assume you consent to us using cookies as described above.

Data collection and purpose specification

We collect the personal data that you may volunteer while using our services. We do not collect information about our visitors from other sources, such as public records or bodies, or private organisations. We do not collect or use personal data for any purpose other than the specific services.

Storage of data

We will not store your personal information for any longer than we need to, however we may be obliged by law to store your communications and personal information including activity logs and we may need to show details of these to government or authorised officials upon request. Like many websites, we use log files to monitor the effectiveness of our website.

The data we collect from you will be stored within the UK & Republic of Ireland. By providing us with this data, you agree to this storing and/or processing.

All our data is stored on our secured servers or on secure servers that are operated by a third party.

If we have provided you with a password which enables you access to our website, you are responsible for keeping this password confidential.

Confidentiality/Security

We have implemented, rules and technical measures to protect the personal data that we have under our control from:

- Unauthorised access
- Improper use or disclosure
- Unauthorised modification
- Unlawful destruction or accidental loss
- Unlawful processing



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All our employees and data processors, who have access to, and are associated with the processing of personal data, are obliged to respect the confidentiality of our members' and visitors' personal data. We ensure that your personal data will not be disclosed to State institutions and authorities except if required by law, other regulation or for funding purposes.

Access to the personal data we may hold about you

You can ask us whether we are keeping personal data about you upon request, which you can indicate by:

Sending an email to golf@downescreditongc.co.uk

Post: Downes Crediton Golf Club, Hookway, Crediton, Devon, EX17 3PT

We will provide you with a readable copy of the personal data which we keep about you, within one month of receipt of this request – although we will before require proof of your identity. This can be extended by two months where the request for rectification is complex. We will provide this information free of charge.

We will however charge a reasonable fee when a request for information is manifestly unfounded or excessive, particularly if it is repetitive. We may also charge a reasonable fee to comply with the requests for further copies of the same information. This fee is based on the administrative cost to provide this information.

We allow you to challenge the data that we hold about you and, where appropriate, you may have the data erased, rectified or amended if it is incorrect or inaccurate. We reserve the right to refuse to provide our visitors with a copy of their personal data if the request is manifestly unfounded or excessive, but we will give reasons for our refusal. We do, however, allow you to challenge our decision to refuse to provide you with a copy of your personal data. You have the right to complain to the supervisory authority and to a judicial remedy without undue delay and at the latest within one month.

Erasure of data

You have a right to have your personal data erased to prevent processing in the following specific circumstances:

Where the personal data is no longer necessary in relation to the purposes for which it was originally collected/processed.

If you wish to withdraw consent.

If you object to the processing and there is no overriding legitimate interest for continuing the processing.

The data was unlawfully processed in accordance with the GDPR.

The personal data has to be erased in order to comply with a legal obligation.

The personal data is processed in relation to the offer of information society services to a child.



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Keeping your information secure

To help us keep your information secure you should:

Keep your password secret.

Never distribute the website addresses for pages that you have looked at while logged in as a registered member or visitor.

You should choose a password that is not obvious or known to anyone else. You should never give a third party your password, as you will be responsible for all activity and charges incurred through use of your password whether authorised by you or not.

If you forget your password, you can request a new password, which will be emailed to the address we hold for you. You can change your password anytime through the MY GOLF facility on the website. Should we think that there is likely to be, or has been any breach of security, we may change your password and notify you of the change by email.

Links

Our website may contain links to let you visit other websites of interest easily. Once you have used these links to leave our website, you should be aware that we do not have any control over that other website. As such we cannot be responsible for the protection and privacy of any information which you provide whilst visiting these websites, and they are not governed by this Privacy Policy. Downes Crediton Golf Club is not responsible for any products and/or services featured on any third-party website. You should exercise caution and look at the Privacy Policy applicable to the website in question.

Notification of changes to this policy

If we decide to change our Privacy Policy, we will post these changes on this website so you know what information we collect and how we use it. If at any point we decide to use personally identifiable information in a way different from that told to you at the time it was collected, we will tell you. You will have a choice as to whether or not we use your information in this different manner.

Privacy Support

If you have an enquiry or concern about our privacy policy please contact us:

Phone: 01363 773025

Email: golf@downescreditongc.co.uk

Post: Downes Crediton Golf Club, Hookway, Crediton, Devon, EX17 3PT.

We try to meet the highest standards when collecting and using personal information. For this reason, we take any complaints we receive about this very seriously. We encourage people to bring it to our attention if they think that our collection or use of information is unfair, misleading or inappropriate. We would also welcome any suggestions for improving our procedures.

This privacy notice was drafted with brevity and clarity in mind. It does not provide exhaustive detail of all aspects of Downes Crediton Golf Club's collection and use of personal information.



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However, we are happy to provide any additional information or explanation needed. Any requests for this should be sent to the address below.

Job applicants, current and former employees

We are the data controller for the information you provide during the process unless otherwise stated. If you have any queries about the process or how we handle your information please contact us at golf@downescreditongc.co.uk

What will we do with the information you provide to us?

All of the information you provide during the process will only be used for the purpose of progressing your application, or to fulfil legal or regulatory requirements if necessary.

We will not share any of the information you provide during the recruitment process with any third parties for marketing purposes. The information you provide will be held securely by us and/or our data processors whether the information is in electronic or physical format.

We will use the contact details you provide to us to contact you to progress your application. We will use the other information you provide to assess your suitability for the role you have applied for.

What information do we ask for, and why?

We do not collect more information than we need to fulfil our stated purposes and will not retain it for longer than is necessary.

The information we ask for is used to assess your suitability for employment. You don't have to provide what we ask for but it might affect your application if you don't.

Conditional offer

If we make a conditional offer of employment, we will ask you for information so that we can carry out pre-employment checks. You must successfully complete pre-employment checks to progress to a final offer. We are required to confirm the identity of our staff, their right to work in the United Kingdom and seek assurance as to their trustworthiness, integrity and reliability.

You will therefore be required to provide:

Proof of your identity – you will be asked to attend our office with original documents, we will take copies.

Proof of your qualifications – you will be asked to attend our office with original documents, we will take copies.

We will contact your referees, using the details you provide in your application, directly to obtain references

If we make a final offer, we will also ask you for the following:

Bank details – to process salary payments

Emergency contact details – so we know who to contact in case you have an emergency at work.